

2024 JAN 22 PM 10:50  
CLERK  
HOF I REO 5 INC

# UNITED STATES BANKRUPTCY COURT

Eastern District Of Pennsylvania

InRe Bennie R. Hearst Pettway d/b/a )  
Connect A Care Network LLC )  
Debtor )

Address 1542 Haines Street )  
Phila, Pennsylvania [19126-2717] )

HOF I REO 5 INC )  
Plaintiff )

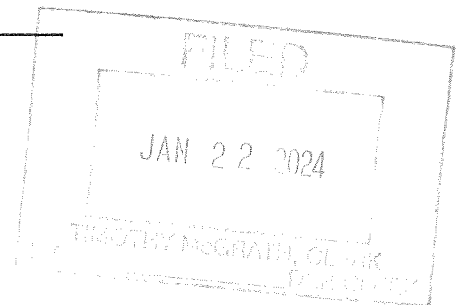
Bennie R. Hearst Pettway )  
Defendant )

Last four of Social-Security or )  
Individual Tax-Payer-Identification )  
(ITIN) No(s)., (if any): xxx-xx-8298 )

Employer's Tax Identification No(s). )  
(if any): 42-3266639 )

Case No.  
23-13550-amc

Chapter  
7



**NOTICE OF APPEAL PAGE ONE (1) AMENDED - (EXHIBIT A)**

**TRANSCRIPT ORDER, AUDIO RECORDING ORDER - (EXHIBIT B)**

**OBJECTION TO HOF I GRANTOR TRUST 5... IT IS NOT A CREDITOR;  
THERE IS NO EVIDENCE OF CONTRACT WITH THEM.  
THEY ARE PLACING FRAUD ON THE COURT - (EXHIBIT C)**

**NOTICE OF APPEARANCE - BENNIE R. HEARST PETTWAY  
(EXHIBIT D)**

**CERTIFICATE OF SERVICE**

# EXHIBIT A

Official Form 417A (12/23)

*Amendment*

[Caption as in Form 416A, 416B, or 416D, as appropriate]

**NOTICE OF APPEAL AND STATEMENT OF ELECTION**

**Part 1: Identify the appellant(s)**

1. Name(s) of appellant(s): DENNIE R. HEARST d/b/a Connect A Care Network LLC \*
2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding.

☐ Plaintiff

☒ Defendant

☐ Other (describe) \_\_\_\_\_

For appeals in a bankruptcy case and not in an adversary proceeding.

☐ Debtor

☒ Creditor

☐ Trustee

☐ Other (describe) \_\_\_\_\_

**Part 2: Identify the subject of this appeal**

1. Describe the judgment—or the appealable order or decree—from which the appeal is taken:  
NO Attorney fee, LLC; Attorney not required by requirement is unconstitutional & 15M Credit Instrument was filed to settle every thing.
2. State the date on which the judgment—or the appealable order or decree—was entered:  
03 January 24 / 13 December 2023 \*

**Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment—or the appealable order or decree—from which the appeal is taken and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

1. Party: NONE Attorney: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Party: NONE Attorney: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

# EXHIBIT B

AO 435 (Rev. 04/18)		ADMINISTRATIVE OFFICE OF THE UNITED STATES COURTS		<b>FOR COURT USE ONLY</b>	
<b>TRANSCRIPT ORDER</b>				<b>DUE DATE:</b>	
<i>Please Read Instructions:</i>					
1. NAME <b>Bennie Pettway</b>		2. PHONE NUMBER <b>(484) 734-5887</b>		3. DATE <b>1/18/2024</b>	
4. DELIVERY ADDRESS OR EMAIL <b>benniepettway@yahoo.com</b>		5. CITY <b>Philadelphia</b>		6. STATE <b>Pa</b>	7. ZIP CODE <b>19126</b>
8. CASE NUMBER <b>23-13550-amc</b>	9. JUDGE <b>Ashley M Chan</b>		DATES OF PROCEEDINGS		
12. CASE NAME <b>Connect A Care Network</b>		10. FROM <b>12/13/2023</b>		11. TO <b>1/3/2024</b>	
		LOCATION OF PROCEEDINGS			
		13. CITY <b>Philadelphia</b>		14. STATE <b>Pa</b>	
15. ORDER FOR					
<input type="checkbox"/> APPEAL		<input type="checkbox"/> CRIMINAL		<input type="checkbox"/> CRIMINAL JUSTICE ACT	
<input type="checkbox"/> NON-APPEAL		<input type="checkbox"/> CIVIL		<input checked="" type="checkbox"/> BANKRUPTCY	
		<input type="checkbox"/> IN FORMA PAUPERIS		<input type="checkbox"/> OTHER	
16. TRANSCRIPT REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which transcript is requested)					
PORTIONS		DATE(S)		PORTION(S)	
<input checked="" type="checkbox"/> VOIR DIRE		01/03/2024		<input type="checkbox"/> TESTIMONY (Specify Witness)	
<input checked="" type="checkbox"/> OPENING STATEMENT (Plaintiff)		01/03/2024			
<input checked="" type="checkbox"/> OPENING STATEMENT (Defendant)		01/03/2024			
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Plaintiff)		01/03/2024		<input type="checkbox"/> PRE-TRIAL PROCEEDING (Specy)	
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Defendant)		01/03/2024			
<input checked="" type="checkbox"/> OPINION OF COURT					
<input type="checkbox"/> JURY INSTRUCTIONS				<input checked="" type="checkbox"/> OTHER (Specify)	
<input type="checkbox"/> SENTENCING				01/03/2024	
<input type="checkbox"/> BAIL HEARING				Bankruptcy proceedings	
17. ORDER					
CATEGORY	ORIGINAL (Includes Certified Copy to Clerk for Records of the Court)	FIRST COPY	ADDITIONAL COPIES	NO. OF PAGES ESTIMATE	COSTS
ORDINARY	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NO. OF COPIES		
14-Day	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
EXPEDITED	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
3-Day	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
DAILY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
HOURLY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
REALTIME	<input type="checkbox"/>	<input type="checkbox"/>			
CERTIFICATION (18. & 19.) By signing below, I certify that I will pay all charges (deposit plus additional).				ESTIMATE TOTAL	0.00
18. SIGNATURE <b>Bennie Pettway</b>				PROCESSED BY	
19. DATE <b>1/18/2024</b>				PHONE NUMBER	
TRANSCRIPT TO BE PREPARED BY				COURT ADDRESS	
ORDER RECEIVED		DATE	BY		
DEPOSIT PAID				DEPOSIT PAID	
TRANSCRIPT ORDERED				TOTAL CHARGES	0.00
TRANSCRIPT RECEIVED				LESS DEPOSIT	0.00
ORDERING PARTY NOTIFIED TO PICK UP TRANSCRIPT				TOTAL REFUNDED	
PARTY RECEIVED TRANSCRIPT				TOTAL DUE	0.00

AO 436 (Rev. 04/13)		<b>ADMINISTRATIVE OFFICE OF THE UNITED STATES COURTS</b>	
<b>AUDIO RECORDING ORDER</b>			
<i>Read Instructions.</i>			
1. NAME <b>Bennie Pettway dba Connect a Care Network LLC</b>		2. PHONE NUMBER <b>(484) 734-5887</b>	
3. EMAIL ADDRESS <b>benniepettway@yahoo.com</b>		4. MAILING ADDRESS <b>1542 Haines Street</b>	
5. CITY <b>Philadelphia</b>		6. STATE <b>Pa</b>	
7. ZIP CODE <b>19126</b>		8. CASE NUMBER <b>23-13550-amc</b>	
9. CASE NAME <b>Connect A Care Network</b>		10. FROM <b>12/13/2023</b>	
11. TO <b>1/3/2024</b>		12. PRESIDING JUDGE <b>Amy M Chan</b>	
13. CITY <b>Philadelphia</b>		14. STATE <b>Pa</b>	

15. ORDER FOR			
<input type="checkbox"/> APPEAL	<input type="checkbox"/> CRIMINAL	<input type="checkbox"/> CRIMINAL JUSTICE ACT	<input checked="" type="checkbox"/> BANKRUPTCY
<input type="checkbox"/> NON-APPEAL	<input type="checkbox"/> CIVIL	<input type="checkbox"/> IN FORMA PAUPERIS	<input type="checkbox"/> OTHER (Specify)

16. AUDIO RECORDING REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which duplicate recordings are requested.)			
PORTION (S)	DATE(S)	PORTION(S)	DATE(S)
<input checked="" type="checkbox"/> VOIR DIRE	<b>12/13/2023</b>	<input type="checkbox"/> TESTIMONY (Specify Witness)	
<input checked="" type="checkbox"/> OPENING STATEMENT (Plaintiff)	<b>12/13/2023</b>		
<input checked="" type="checkbox"/> OPENING STATEMENT (Defendant)	<b>12/13/2023</b>		
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Plaintiff)	<b>12/13/2023</b>	<input type="checkbox"/> PRE-TRIAL PROCEEDING (Specify)	
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Defendant)	<b>12/13/2023</b>		
<input checked="" type="checkbox"/> OPINION OF COURT	<b>12/13/2023</b>	<input checked="" type="checkbox"/> OTHER (Specify)	
<input type="checkbox"/> JURY INSTRUCTIONS		<b>Bankruptcy proceedings</b>	<b>12/13/2023</b>
<input type="checkbox"/> SENTENCING			
<input type="checkbox"/> BAIL HEARING			

17. ORDER		
	NO. OF COPIES REQUESTED	COSTS
<input type="checkbox"/> DUPLICATE TAPE(S) FOR PLAYBACK ON A STANDARD CASSETTE RECORDER		
<input type="checkbox"/> RECORDABLE COMPACT DISC - CD		
<input checked="" type="checkbox"/> ELECTRONIC FILE (via email, digital download, or other Judicial Conference Approved Media)	<b>1</b>	
<b>ESTIMATE TOTAL</b>		<b>0.00</b>

CERTIFICATION (18. & 19.) By signing below, I certify that I will pay all charges (deposit plus additional) upon completion of the order.	
18. SIGNATURE <b>Bennie R Pettway</b>	19. DATE <b>1/18/2024</b>

PROCESSED BY			PHONE NUMBER	
ORDER RECEIVED	DATE	BY	DEPOSIT PAID	
DEPOSIT PAID			TOTAL CHARGES	<b>0.00</b>
TAPE / CD DUPLICATED (if applicable)			LESS DEPOSIT	<b>0.00</b>
ORDERING PARTY NOTIFIED TO PICK UP TAPE/CD (if applicable)			TOTAL REFUNDED	
PARTY RECEIVED AUDIO RECORDING			TOTAL DUE	<b>0.00</b>

DISTRIBUTION: COURT COPY ORDER RECEIPT ORDER COPY

AO 435 Administrative Office of the United States District Court AZ Form (Rev. 10/2023)				Document Page 7 of 22		<b>FOR COURT USE ONLY</b> <b>DUE DATE:</b>	
<b>TRANSCRIPT ORDER</b>							
1. NAME <b>Bennie Pettway</b>				2. PHONE NUMBER <b>484-734-5887</b>		3. DATE <b>1/18/2024</b>	
4. FIRM NAME <b>CONNECT A CARE NETWORK LLC</b>							
5. MAILING ADDRESS <b>1542 Haines Street</b>				6. CITY <b>Philadelphia</b>		7. STATE <b>Pa</b>	
8. ZIP CODE <b>19126</b>							
9. CASE NUMBER <b>23-13550-amc</b>		10. JUDGE <b>Ashley M Chan</b>		DATES OF PROCEEDINGS			
11. <b>12/13/2023</b>		12. <b>12/13/2023</b>					
13. CASE NAME <b>Connect A Care Network</b>				LOCATION OF PROCEEDINGS			
14. <b>Philadelphia</b>				15. STATE <b>Pa</b>			
16. ORDER FOR <input type="checkbox"/> APPEAL <input type="checkbox"/> CRIMINAL <input type="checkbox"/> CRIMINAL JUSTICE ACT <input checked="" type="checkbox"/> BANKRUPTCY <input type="checkbox"/> NON-APPEAL <input type="checkbox"/> CIVIL <input type="checkbox"/> IN FORMA PAUPERIS <input type="checkbox"/> OTHER (Specify)							
17. TRANSCRIPT REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which transcript is requested.)							
PORTIONS		DATE(S)		PORTION(S)		DATE(S)	
<input checked="" type="checkbox"/> VOIR DIRE		12/13/2023		<input type="checkbox"/> TESTIMONY (Specify)			
<input checked="" type="checkbox"/> OPENING STATEMENT (Plaintiff)		12/13/2023					
<input checked="" type="checkbox"/> OPENING STATEMENT (Defendant)		12/13/2023					
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Plaintiff)		12/13/2023		<input type="checkbox"/> PRE-TRIAL PROCEEDING			
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Defendant)		12/13/2023					
<input checked="" type="checkbox"/> OPINION OF COURT		12/13/2023		<input checked="" type="checkbox"/> OTHER (Specify)			
<input type="checkbox"/> JURY INSTRUCTIONS				<b>Bankruptcy Proceedings</b>		<b>12/13/2023</b>	
<input type="checkbox"/> SENTENCING							
<input type="checkbox"/> BAIL HEARING							
18. ORDER							
CATEGORY	ORIGINAL + 1 (original to Court, copy to ordering party)	FIRST COPY	# OF ADDITIONAL COPIES	DELIVERY INSTRUCTIONS (Check all that apply.)		ESTIMATED COSTS	
30-Day (Ordinary)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/> PAPER COPY			
14-Day Transcript	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/> PDF (e-mail)			
7-Day (Expedited)	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/> ASCII (e-mail)			
3 -Day Transcript	<input type="checkbox"/>	<input type="checkbox"/>					
Next-Day (Daily)	<input type="checkbox"/>	<input type="checkbox"/>					
2-Hour (Hourly)	<input type="checkbox"/>	<input type="checkbox"/>					
Realtime Transcript	<input type="checkbox"/>	<input type="checkbox"/>		E-MAIL ADDRESS			
CERTIFICATION (19. & 20.) By signing below, I certify that I will pay all charges (deposit plus additional).				<b>NOTE: IF ORDERING MORE THAN ONE FORMAT,          THERE WILL BE AN ADDITIONAL CHARGE.</b>			
19. SIGNATURE <b>Bennie R Pettway</b>							
20. DATE <b>1/18/2024</b>							
TRANSCRIPT TO BE PREPARED BY				ESTIMATE TOTAL			
ORDER RECEIVED		DATE	BY	PROCESSED BY		PHONE NUMBER	
DEPOSIT PAID				DEPOSIT PAID			
TRANSCRIPT ORDERED				TOTAL CHARGES			
TRANSCRIPT RECEIVED				LESS DEPOSIT			
ORDERING PARTY NOTIFIED TO PICK UP TRANSCRIPT				TOTAL REFUNDED			
PARTY RECEIVED TRANSCRIPT				TOTAL DUE			

DISTRIBUTION: COURT COPY    TRANSCRIPTION COPY    ORDER RECEIPT    ORDER COPY

AO 436 (Rev. 04/13)		ADMINISTRATIVE OFFICE OF THE UNITED STATES COURTS <b>AUDIO RECORDING ORDER</b>	
<i>Read Instructions.</i>			
1. NAME <b>Bennie Pettway dba Connect a Care Network LLC</b>		2. PHONE NUMBER <b>(484) 734-5887</b>	
3. EMAIL ADDRESS <b>benniepettway@yahoo.com</b>		4. MAILING ADDRESS <b>1542 Haines Street</b>	
5. CITY <b>Philadelphia</b>		6. STATE <b>Pa</b>	
7. ZIP CODE <b>19126</b>		8. CASE NUMBER <b>23-13550-amc</b>	
9. CASE NAME <b>Connect A Care Network</b>		10. FROM <b>12/13/2023</b>	
11. TO <b>12/13/2023</b>		12. PRESIDING JUDGE <b>Ashley M Chan</b>	
13. CITY <b>Philadelphia</b>		14. STATE <b>Pa</b>	

15. ORDER FOR			
<input type="checkbox"/> APPEAL	<input type="checkbox"/> CRIMINAL	<input type="checkbox"/> CRIMINAL JUSTICE ACT	<input checked="" type="checkbox"/> BANKRUPTCY
<input type="checkbox"/> NON-APPEAL	<input type="checkbox"/> CIVIL	<input type="checkbox"/> IN FORMA PAUPERIS	<input type="checkbox"/> OTHER (Specify)

16. AUDIO RECORDING REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which duplicate recordings are requested.)			
PORTION (S)	DATE(S)	PORTION(S)	DATE(S)
<input checked="" type="checkbox"/> VOIR DIRE	12/13/2023	<input type="checkbox"/> TESTIMONY (Specify Witness)	
<input checked="" type="checkbox"/> OPENING STATEMENT (Plaintiff)	12/13/2023		
<input checked="" type="checkbox"/> OPENING STATEMENT (Defendant)	12/13/2023		
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Plaintiff)	12/13/2023	<input type="checkbox"/> PRE-TRIAL PROCEEDING (Specify)	
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Defendant)	12/13/2023		
<input checked="" type="checkbox"/> OPINION OF COURT	12/13/2023	<input checked="" type="checkbox"/> OTHER (Specify)	
<input type="checkbox"/> JURY INSTRUCTIONS		<b>Bankruptcy proceedings</b>	12/13/2023
<input type="checkbox"/> SENTENCING			
<input type="checkbox"/> BAIL HEARING			

17. ORDER		
	NO. OF COPIES REQUESTED	COSTS
<input type="checkbox"/> DUPLICATE TAPE(S) FOR PLAYBACK ON A STANDARD CASSETTE RECORDER		
<input type="checkbox"/> RECORDABLE COMPACT DISC - CD		
<input checked="" type="checkbox"/> ELECTRONIC FILE (via email, digital download, or other Judicial Conference Approved Media)	1	
<b>ESTIMATE TOTAL</b>		<b>0.00</b>

CERTIFICATION (18. & 19.) By signing below, I certify that I will pay all charges (deposit plus additional) upon completion of the order.	
18. SIGNATURE <b>Bennie R Pettway</b>	19. DATE <b>1/18/2024</b>

PROCESSED BY				PHONE NUMBER
ORDER RECEIVED	DATE	BY	DEPOSIT PAID	
DEPOSIT PAID			TOTAL CHARGES	0.00
TAPE / CD DUPLICATED (if applicable)			LESS DEPOSIT	0.00
ORDERING PARTY NOTIFIED TO PICK UP TAPE/CD (if applicable)			TOTAL REFUNDED	
PARTY RECEIVED AUDIO RECORDING			TOTAL DUE	0.00

DISTRIBUTION: COURT COPY ORDER RECEIPT ORDER COPY



# EXHIBIT C

## **NOTICE OF FRAUD ON THE COURT**

HOF I Grantor Trust 5 has absolutely no current relationship with me nor have they ever had a relationship with me to date to do or perform or transact business here in.

That business acting as a trust is fraudulently inserting itself into my case as a creditor and this is not true.

**CHAPTER 22**  
**FORM, FORMATION AND READJUSTMENT**  
**OF CONTRACT**

**Sec.**

- 2201. Formal requirements; statute of frauds.
- 2202. Final written expression: parol or extrinsic evidence.
- 2203. Seals inoperative.
- 2204. Formation in general.
- 2205. Firm offers.
- 2206. Offer and acceptance in formation of contract.
- 2207. Additional terms in acceptance or confirmation.
- 2208. Course of performance or practical construction (Deleted by amendment).
- 2209. Modification, rescission and waiver.
- 2210. Delegation of performance; assignment of rights.

**Enactment.** Chapter 22 was added November 1, 1979, P.L.255, No.86, effective January 1, 1980.

**§ 2201. Formal requirements; statute of frauds.**

(a) **General rule.**--Except as otherwise provided in this section a contract for the sale of goods for the price of \$500 or more is not enforceable by way of action or defense unless there is some writing sufficient to indicate that a contract for sale has been made between the parties and signed by the party against whom enforcement is sought or by his authorized agent or broker. A writing is not insufficient because it omits or incorrectly states a term agreed upon but the contract is not enforceable under this subsection beyond the quantity of goods shown in such writing.

(b) **Writing confirming contract between merchants.**--Between merchants if within a reasonable time a writing in confirmation of the contract and sufficient against the sender is received and the party receiving it has reason to know its contents, it satisfies the requirements of subsection (a) against such party unless written notice of objection to its contents is given within ten days after it is received.

(c) **Enforceability of contracts not satisfying general requirements.**--A contract which does not satisfy the requirements of subsection (a) but which is valid in other respects is enforceable:

(1) if the goods are to be specially manufactured for the buyer and are not suitable for sale to others in the ordinary course of the business of the seller and the seller, before notice of repudiation is received and under circumstances which reasonably indicate that the goods are for the buyer, has made either a substantial beginning of their manufacture or commitments for their procurement;

(2) if the party against whom enforcement is sought admits in his pleading, testimony or otherwise in court that a contract for sale was made, but the contract is not enforceable under this provision beyond the quantity of goods admitted; or

(3) with respect to goods for which payment has been made and accepted or which have been received and accepted (section 2606).

(d) **Qualified financial contracts.**--Subsection (a) does not apply to a qualified financial contract, as defined in section 1206(c)(1) (relating to statute of frauds for kinds of personal property not otherwise covered), if either:

(1) there is, as provided in section 1206(c)(3), sufficient evidence to indicate that a contract has been made; or

(2) the parties, by means of a prior or subsequent written contract, have agreed to be bound by the terms of the qualified financial contract from the time they reach agreement (by telephone, by exchange of electronic messages or otherwise) on those terms.

(May 22, 1996, P.L.248, No.44, eff. imd.)

**1996 Amendment.** Act 44 added subsec. (d). See section 14(c) of Act 44 in the appendix to this title for special provisions relating to applicability to qualified financial contracts.

**References in Text.** Section 1206, referred to in this section, was repealed and added by the act of April 16, 2008 (P.L.57, No.13). Present section 1206 relates to presumptions.

**Cross References.** Section 2201 is referred to in sections 2209, 2326 of this title.

**§ 2202. Final written expression: parol or extrinsic evidence.**

Terms with respect to which the confirmatory memoranda of the parties agree or which are otherwise set forth in a writing intended by the parties as a final expression of their agreement with respect to such terms as are included therein may not be contradicted by evidence of any prior agreement or of a contemporaneous oral agreement but may be explained or supplemented:

(1) by course of performance, course of dealing or usage of trade (section 1303); and

(2) by evidence of consistent additional terms unless the court finds the writing to have been intended also as a complete and exclusive statement of the terms of the agreement. (Apr. 16, 2008, P.L.57, No.13, eff. 60 days)

**Cross References.** Section 2202 is referred to in sections 2316, 2326 of this title.

**§ 2203. Seals inoperative.**

The affixing of a seal to a writing evidencing a contract for sale or an offer to buy or sell goods does not constitute the writing a sealed instrument and the law with respect to sealed instruments does not apply to such a contract or offer.

**§ 2204. Formation in general.**

(a) **General rule.**--A contract for sale of goods may be made in any manner sufficient to show agreement, including conduct by both parties which recognizes the existence of such a contract.

(b) **Effect of undetermined time of making agreement.**--An agreement sufficient to constitute a contract for sale may be found even though the moment of its making is undetermined.

(c) **Effect of open terms.**--Even though one or more terms are left open a contract for sale does not fail for indefiniteness if the parties have intended to make a contract and there is a reasonably certain basis for giving an appropriate remedy.

**Cross References.** Section 2204 is referred to in section 2311 of this title.

**§ 2205. Firm offers.**

An offer by a merchant to buy or sell goods in a signed writing which by its terms gives assurance that it will be held open is not revocable, for lack of consideration, during the time stated or if no time is stated for a reasonable time, but in no event may such period of irrevocability exceed three months; but any such term of assurance on a form supplied by the offeree must be

# EXHIBIT D

**UNITED STATES BANKRUPTCY COURT**  
Eastern District Of Pennsylvania

INRE: Connect A Care Network LLC CHAPTER 7  
d/b/a Connect A Care

Debtor(s) BKY. NO. 23-13550-AMC

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICES**

To the Clerk

Kindly enter my appearance on behalf of Connect A Care Network LLC and index same on master mailing list.

Respectfully submitted,

/s/ **Bennie R. Hearst Pettway**  
Bennie R. Hearst Pettway  
22 January 2024

1542 Haines Street  
Philadelphia, Pennsylvania 19126-2717

**UNITED STATES BANKRUPTCY COURT**  
Eastern District Of Pennsylvania

INRE: Connect A Care Network LLC CHAPTER 7  
d/b/a Connect A Care

Debtor(s) BKY. NO. 23-13550-AMC

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICES**

To the Clerk

Kindly enter my appearance on behalf of Connect A Care Network LLC and index same on master mailing list.

Respectfully submitted,

/s/ **Bennie R. Hearst Pettway**

Bennie R. Hearst Pettway  
22 January 2024

1542 Haines Street  
Philadelphia, Pennsylvania 19126-2717

## CERTIFICATE OF SERVICE

I certify that a copy of the above UNITED STATES BANKRUPTCY PETITION WAS NOTICED AND SERVED and has been furnished either by way of walk-in, Facsimile or certified mail, first class mail, priority or expressed post and/or emailed to:

Eric Feder, Prothonotary  
Philadelphia County Office of the Prothonotary  
1400 John F Kennedy Blvd, City Hall, Room 284  
Philadelphia, Pennsylvania 19107-3243

Phone: (215) 686-6652  
courts@phila.gov

Eric Feder  
Philadelphia Court of Common Pleas  
1301 Filbert Street, Suite 310 B  
Philadelphia, PA 19107-2605

Craig L. Knutson, CEO  
MFA Financial Inc  
One Vanderbilt Avenue, 48<sup>th</sup> Floor  
New York, New York 10017-3807

Vincent DiMaiolo, Jr., Esq., PA Sup Ct ID No. 59461  
Fein, Such, Kahn & Shepard, P.C.  
7660 Imperial Way, Suite 121  
Allentown, Pennsylvania 18195-1022

Phone: (610) 395-3535  
Fax: (610) 395-3566  
vdimaiolo@fskslaw.com

Jeff Tennyson, President & CEO  
Lima One Capital LLC  
502 W. 7<sup>th</sup> Street, Suite 100  
Erie, Pennsylvania 16502-1333



Certificate of Service

Page 2 of 7

Jeff Tennyson, President & CEO  
Lima One Capital LLC  
201 McBee Avenue, Suite 300  
Greenville, South Carolina 29601-2884

Kevin Holliday, Director of Operations  
HOF I REO 5 INC  
251 Little Falls Drive  
Wilmington, Delaware 19808-1674

Joshua H. Roberts, PA Sup Ct ID No. 88595  
1400 JFK Blvd., City Hall Room 538  
Philadelphia, PA 19107-3200

roberts.virtualcourtroom  
@courts.phila.gov  
Phone: (215) 686-7340  
Fax: (215) 686-7048

Carmella Jacquinto, PA Sup Ct ID No. 88595  
Court of Common Pleas of Philadelphia County  
1301 Filbert Street, Room 1205  
Philadelphia, Pennsylvania 19107-2602

Phone: (215) 683-7047  
Fax: (215) 683-7049

Daniel J. Anders, PA Sup Ct ID No. 82413  
Court of Common Pleas of Philadelphia County  
1400 John F. Kennedy Boulevard, City Hall Room 290  
Philadelphia, Pennsylvania 19107-3246

Phone: (215) 683-7148

Tina Masi, Office Court Reporter  
Court of Common Pleas of Philadelphia County  
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Date: 22 January 2024

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